

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

OHIO PUBLIC EMPLOYEES RETIREMENT
SYSTEM ET AL.,

Plaintiffs,

v.

BP P.L.C. ET AL.,

Defendants.

No. 4:12-cv-01837

IN RE BP P.L.C. SECURITIES LITIGATION

No. 4:10-md-02185

Honorable Keith P. Ellison

JURY TRIAL DEMANDED

ORAL ARGUMENT REQUESTED

DECLARATION OF GEORGIA L. LUCIER

Pursuant to 28 U.S.C. § 1746, I, GEORGIA L. LUCIER, declare as follows:

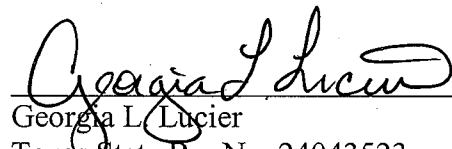
1. I am over twenty-one years of age and I am fully competent to make this Declaration. I have personal knowledge of the facts set forth in this Declaration.
2. I am an attorney in the law firm of Andrews Kurth LLP. My office is located at 600 Travis, Suite 4200, Houston, Texas 77002.
3. I am a member in good standing of the State Bar of Texas.
4. I am one of the attorneys for the defendants in the above-captioned matter. I submit this declaration to provide the Court with materials cited in Defendants' Memorandum of Law in Opposition to Plaintiffs' Motion to Remand, which is being filed on July 19, 2012.
5. Attached hereto as Exhibit A is a true and correct copy of *Information Requirements for Exploration Plans and Development Operations Coordination Documents*,

NTL No. 2008-G04, issued by the Minerals Management Service of the U.S. Department of the Interior on April 1, 2008, available at:

<http://www.gomr.boemre.gov/homepg/regulate/regs/ntls/2008NTLs/08-g04.pdf>.

6. Attached hereto as Exhibit B is a true and correct copy of excerpts from the National Commission on the BP Deepwater Horizon Oil Spill and Offshore Drilling, *Report to the President, Deep Water: The Gulf Oil Disaster and the Future of Offshore Drilling*, released in January 2011. The excerpted material is from certain introductory pages and pages 82-85 of the 398-page document.

I declare under penalty of perjury that the foregoing is true and correct.



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Executed on this 19th day of July, 2012.